

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**DAVID KLEIN,**

**Plaintiff,**

**v.**

**WEXFORD HEALTH SOURCE, INC., et al.,**

**Defendants.**

**No. 16-cv-08818**

**Hon. Gary S. Feinerman  
Mag. Judge Susan E. Cox**

**JOINT STATUS REPORT**

In response to the Court's Order of May 29, 2020 (R. 149), the parties jointly report as follows concerning the status of this matter in advance of the telephonic status hearing scheduled for June 10, 2020:

**A. Remaining Work Prior to Trial**

As discussed with the Court at the most recent status conference in this case, Plaintiff intends to file a motion for reconsideration of the Court's decision concerning Defendants' summary judgment. The parties agree and propose the following briefing schedule for Plaintiff's motion:

July 10, 2020: Plaintiff's motion and supporting memorandum;

August 10, 2020: Defendants' response memorandum;

August 24, 2020: Plaintiff's reply memorandum.

**B. Proposed Trial Dates**

In response to the Court's directive to propose three possible dates in October – December, 2020 for a trial setting in this matter, the parties have conferred regarding counsel's availability during that time period. Due to Defendants' counsel's current trial schedule,

availability during October to December is limited. The parties propose the date of December 14, 2020. In the alternative, the parties would request a brief telephone conference with the Court to discuss trial scheduling.

### C. Settlement Efforts

The Plaintiff proposed a revised settlement demand that would fully resolve all remaining claims, which Defendant has considered and rejected. Defendant has not provided a counterproposal for settlement, and is not interested in further settlement discussions at this time.

Dated: June 5, 2020

Respectfully submitted,

SCHIFF HARDIN LLP

By: /s/ Jasmine Kayla Dela Luna

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**CERTIFICATE OF SERVICE**

I, Jasmine Kayla Dela Luna, do hereby certify that on June 5, 2020, I electronically filed the foregoing document using the CMF/ECF system, which will cause an electronic copy to be served on counsel of record.

/s/ Jasmine Kayla Dela Luna  
Jasmine Kayla Dela Luna